



**COUNT TWO**

Beginning on or about February 1, 2024, and continuing until on or about May 8, 2024, in the Western District of Texas, Defendants,

**(1) APRIL MARYLOU CORNEJO,  
(2) CANDY VALERIE CORNEJO,  
(3) ISAAC DAVID CORNEJO, and  
(4) BRIAN ARON CHAIREZ**

knowingly, intentionally, and unlawfully conspired, combined, confederated, and agreed together, and with others to the Grand Jury unknown, to commit an offense against the United States, namely: to transport and move and attempt to transport and move aliens within the United States knowing and in reckless disregard of the fact that said aliens had come to, entered, and remained in the United States in violation of law, said transportation being in furtherance of said violation of law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), (a)(1)(A)(ii) and (a)(1)(B)(i).

**COUNT THREE**

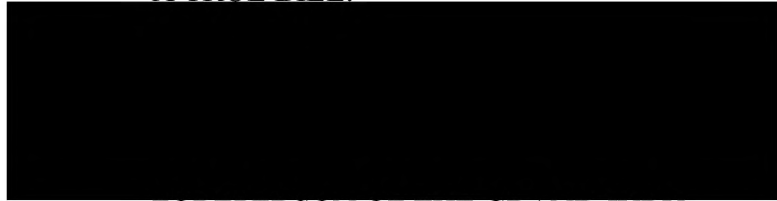
On or about May 8, 2024, in the Western District of Texas, Defendants,

**(1) APRIL MARYLOU CORNEJO,  
(2) CANDY VALERIE CORNEJO,  
(3) ISAAC DAVID CORNEJO, and  
(4) BRIAN ARON CHAIREZ**

knowing and in reckless disregard of the fact that a certain alien had come to, entered, and remained in the United States in violation of law, transported and moved, and attempted to transport and move such alien within the United States in furtherance of said violation of law, all

done for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (a)(1)(B)(i).

A TRUE BILL.



FOREPERSON OF THE GRAND JURY

JAIME ESPARZA  
UNITED STATES ATTORNEY

BY:   
Assistant U.S. Attorney